Handcarried to
EPA on 27 May

San Mateo County Mid-Coastside Facilities Consolidation, C-06-1022 Subject:

State Clearinghouse No. 75090824

From: Gil Wheeler

To: The Files

As indicated in Section 6.212(a) of the April 14, 1975 Final Regulations (40 CFR Part 6) for the Preparation of Environmental Impact Statements published by the Environmental Protection Agency in the Federal Register, "When an environmental review indicates there will be no significant impact or (when) significant adverse impacts have been eliminated by making changes in the project, the responsible official must prepare a Negative Declaration to allow public review of this decision before it becomes final The official shall have an Environmental Impact Appraisal supporting the Negative Declaration available for public review when the Negative Declaration is released..."

After critically evaluating all information submitted for environmental review, I am making the recommendation that an Environmental Impact Statement should not be written under the aforementioned authority. The following is an appraisal supporting my recommendation.

Background

The Sewer Authority Mid-Coastside (S.A.M.) is a joint powers agency composed of three sanitary agencies in the Mid-Coastside of San Mateo County, California, approximately thirty miles south

of San Francisco. This project will enable the total consolidation of sewage treatment and disposal functions for the three members of S.A.M. - the Granada Sanitary District, the City of Half Moon Bay, and the Montara Sanitary District by construction of a new sewage interceptor pipeline, a new 2 MGD treatment facility and additional effluent disposal facilities. Presently, each of the three sewerage agencies operates its own collection system, treatment plant, and Pacific Ocean outfall. Granada's treatment facility does not meet Federal secondary treatment standards, and both Granada and Montara discharge sewage effluent near a State designated area of special biological significance, the Fitzgerald Marine Preserve. Both Montara and Granada have been issued a cease and desist order by the Regional Water Quality Control Board. While the City of Half Moon Bay treatment facility has generally met Federal secondary treatment standards, it is an interim facility with numerous operational problems. These problems have contributed to an increasing loss of reliability for controlling the suspended solids concentration and the pH of the effluent. The condition of the City of Half Moon Bay plant will make it increasingly difficult to meet secondary treatment standards.

Project Description

The portions of the project which will receive the initial grant are the on-shore facilities composed of transmission and treatment facilities. Because of the need for additional oceanographic information to evaluate alternative sites for the ocean outfall, the approval for construction of the ocean outfall will not be given until December of 1976. Construction of both the on-shore

facilities and off-shore facilities will be completed concurrently. The project's on-shore facilities are composed of approximately 7 miles of interceptor to transfer raw sewage from the existing Granada and Montara plant sites to the site of the new consolidated plant site at the present City of Half Moon Bay plant site, two new raw sewage pump stations to lift sewage along the interceptor route, and a new 2 MGD activated sludge treatment plant on the site of the existing City of Half Moon Bay plant. Most major components of the existing City of Half Moon Bay treatment facility will be modified and incorporated into the new treatment works. No expansion of the present City of Half Moon Bay plant boundaries are required. The grant eligible treatment plant capacity is 1.3 MGD which is based on the 10 year Department of Finance population projection for the Mid-Coastside service area. A sketch of the primary project components is attached to this appraisal.

Demography

The Mid-Coastside communities participating in this project are located in the narrow coastal plain between the Coast Range and the Pacific Ocean. The present population of the service area is estimated by the Department of Finance as 11,580. The project service area is a bedroom community for the urban Bay Area with most service area residents commuting to work at urban centers located north and east of the Mid-Coastside. The communities in the service area are, on the average, more effluent than the Bay Area in general and residential housing is much in demand. The major wastewater management studies that have been conducted such as the San Mateo County Subregional Plan, the Basin Plan, and the

BASSA Wastewater Management Plant have all selected total consolidation of sewage treatment and disposal as the most effective wastewater management program for the Mid-Coastside. This project conforms to the above mentioned plans.

Project Alternatives

Treatment alternatives evaluated included different combinations of abandoning, enlarging, upgrading and maintaining at their present location each of the three present treatment plants to achieve no, partial or complete consolidation. Disposal alternatives included ocean discharge at a site north of Montara, a site near the existing Half Moon Bay outfall, and a site at Miramontes Point. Reclamation was included as a part of all disposal alternatives but because of the lack of significant demand for reclaimed wastewater during wet weather, a new outfall to supplement the existing outfall is required in each alternative. The most cost-effective treatment alternative was considered to be a totally consolidated facility at the City of Half Moon Bay treatment plant site. This alternative offered the lowest operation and maintenance cost, the highest reliability, and the greatest opportunity for regional reclamation. The two best possible locations for the ocean outfall are at Half Moon Bay and Miramontes Point. As mentioned, the final outfall location will be selected at the completion of the extended Phase I oceanographic work in December 1976.

Local Controversy

The selection of the final project alternative caused considerable controversy between the regulatory agencies and the grantees. The

local agencies originally selected Alternative A which called for the upgrading of the Montara and City of Half Moon Bay facilities, the construction of a new secondary treatment facility at Granada. and the construction of a new joint outfall at Half Moon Bay. However, the regulatory agencies favored Plan F, the alternative of full consolidation at the City of Half Moon Bay plant, because of its agreement with all previous regional wastewater management studies, its higher reliability, and its lower present worth cost when compared to Plan A. Grant funding was subsequently denied for those project components which did not constitute a part of Plan F. The local agencies agreed to proceed with Plan F if the grant eligible capacity was raised to 1.8 MGD. Although S.A.M.'s request for additional grant funding was denied by the State Water Resources Control Board, the local agencies did finally agree to pursue Plan F as the most desirable long term solution for wastewater management on the Mid-Coastside.

Environmental Impacts

The principle short term primary impacts of project construction are noise, disturbance of fish and wildlife, dust, traffic disruption, increased air emissions from mobil sources, and the potential for disturbance of archeological sites. These impacts will be caused by construction activity and will be temporary and unavoidable. To prevent disturbance of archeological sites a specific list of sensitive areas to be avoided with heavy equipment and construction activity will be required to be included in the construction contract specifications. Long term primary impacts of project implementation are possible noise and odors from pump stations and the treatment facilities, an improvement in water

quality in the Mid-Coastside area, and cost to the local service area residents and commercial establishments. Noise and odor impacts can be mitigated or prevented by proper design techniques and by operation and maintenance techniques approved by the State Water Resources Control Board. The cost to residents in the service area has been reduced through the offer of Federal and State Clean Water Grants for the eligible project capacity.

Secondary impacts of project implementation are those associated with growth and development on the Mid-Coastside, namely increased air pollution in the San Francisco air basin and the conversion of prime agricultural land to residential use. Granada has been under a self imposed building ban for two years because of a lack of sewage treatment capacity. This project will increase the sewage treatment capacity available to Granada by 60 percent. Although the other two communities have not had wastewater related building restrictions, this project will enable continued growth in the service area. The project can accommodate an ultimate population of approximately 26,000 which represents an approximate doubling of the current population. The project may interfere with the efforts to attain and maintain the National Ambient Air Quality Standards in this air basin due to the higher than average VMT generated by Mid-Coastside residents.

Mitigation of Impacts

The air quality impacts have been mitigated by commitments on the part of the grantees to cooperate in the further

development of mass transit on the Mid-Coastside and to participate in the development of and the implementation of the Air Quality Maintenance Planning effort to be conducted by the California Air Resources Board and the Environmental Management Task Force. The secondary impact of service area growth and the conversion of prime agricultural land will be mitigated by required commitments from the grantees to:

- 1. Reserve 0.3 MGD of the facility capacity for recreational (non-residential) use only for the next ten years.
- 2. Not expand their present service area beyond the urbanized Mid-Coastside areas recognized by the Association of Bay Area Governments (ABAG).
- 3. Request that San Mateo County perform a complete sphere of influence and urban service area boundary study.

These actions will reduce the permanent population that can be served by the project by approximately 4,000 people and will bring the population and service area influence in line with that recommended by ABAG. The above growth mitigating measures were requested as a prerequisite to ABAG's A-95 approval for the Step 2 grant.

Irreversible or Irretrievable Commitment of Resources

The irreversibly and irretrievably committed resources are limited to capital, materials, and prime agricultural land due to continued urbanization. The unavoidable impacts are the unmitigated construction impacts, the potential for increased

air pollution, and the conversion of prime agricultural land to urban use. The elimination of the discharge of sewage effluent from the Montara and Granada sewage treatment plants to areas of special biological significance and the provisions for higher levels of treatment for the wastewater will enhance the long term productivity of the near shore waters of the applicants' communities

After an analysis of the short term uses of the environment and the long term effects of productivity, I find that the uses of the environment will not be significantly affected by the proposed project. A public hearing was held on September 17, 1975, and all public concerns have been resolved. The applicant's environmental impact assessment satisfactorily addressed all aspects of the projects environmental impact, and I find the unmitigated adverse impacts not to be significant in relationship to the beneficial impacts. Consequently, I am recommending that the Environmental Protection Agency write a Negative Declaration on this project and provide Federal grant funds for the project design and construction.

CONCURRENCE - SWRCB

CONCURRENCE - EPA

Project Evaluator

Team /Leader

Section Chief

Assistant Division Chief

Team Leader